

Equality statement for Telenor ASA for 2021

This equality statement is prepared for the company Telenor ASA as the headquarters of Telenor Group, reporting as an employer in the geography Norway. In addition, Telenor Group as a global company, has chosen to present an overview on gender pay for the telecom business units, as this is an important topic to Telenor in all its markets irrespective of local reporting requirements. Additional Information is available on telenor.com: [Equality & Gender Pay](#)

Global Bands	GEM & CEOs	TMA	A	B	C	D	E	F	G	Average Business Units
Telenor Norway			n<5 4/41	103% 55/182	99% 225/719	97% 239/682	95% 187/330	104% 266/351	n/a	90% 980/2309
Telenor ASA (in Norway)			88% 14/47	90% 33/49	96% 32/51	95% 26/38	103% 24/8		n/a	90% 143/207
Telenor Sweden			n<5 2/3	111% 9/33	103% 75/226	96% 138/283	96% 120/197	99% 84/77	98% 100/260	94% 528/1079
Telenor Denmark			n<5 0/5	94% 4/23	98% 23/50	97% 51/124	91% 44/103	103% 87/129	104% 134/308	96% 343/742
DNA Finland	78% 4/14	99% 33/60	n<5 3/15	94% 5/41	94% 55/125	93% 148/340	91% 142/235	91% 126/102	103% 130/98	80% 609/956
Digi Malaysia			86% 26/30	94% 61/86	100% 144/176	95% 133/157	104% 156/130	104% 117/77	99% 71/48	84% 708/704
Dtac Thailand			92% 13/16	90% 194/161	84% 194/130	88% 375/233	87% 578/192	97% 594/164	n/a	63% 1934/896
Grameenphone Bangladesh			80% 7/45	87% 6/91	94% 31/149	98% 26/345	93% 80/452	80% 108/279	n/a	74% 259/1360
Telenor Pakistan			91% 6/26	87% 27/113	94% 40/255	99% 108/407	99% 50/127	100% 16/11	n/a	84% 247/939
Telenor Group										85% 38%/62%

Part 1: Equality statement

In Telenor ASA, we work for equality and against all discrimination on the basis of gender, pregnancy, parental or adoption leave, care responsibilities, ethnicity, religion, beliefs, disability, sexual orientation, gender identity, gender expression and any combinations of these. The factual situation concerning gender equality in Telenor ASA for the period January-December 2021 is presented in the following.

The figures below represent Telenor ASA as an employer in Norway in line with Norwegian reporting requirements, Telenor Norway presents its own report. More details regarding Telenor Group's Executive Management (GEM) can be found in Telenor's publicly available executive compensation report.

1 Distribution of women and men by company and at position levels, and gender pay differentials

	Gender representation at different position levels number of employees		Pay differentials women's share of men's salary as a percentage	
	Women	Men	Base salary	Total compensation includes all taxable income
Total distribution women vs men in the company	143	207	90%	87%
Group Executive Management (GEM)	3	1	n/a	n/a
TMA	11	13	102%	99%
Band A	14	47	88%	85%

Band B	33	49	90%	85%
Band C	32	51	96%	93%
Band D	26	38	95%	91%
Band E/F	24	8	103%	103%

1.1 Definition of employee categories

We have discussed the definition of employee categories with our Union representatives and have chosen a categorisation based on job level. The categorisation is based on several assessment factors, including the positions' responsibilities, impact, complexity and required experience. The job categories are defined across organisational units.

In the following there is a more detailed description of which job categories are grouped in the different levels ("bands") in the model.

Group Executive Management (GEM)

This group includes Group President & CEO and the other members of the Group Executive Management (Executive Vice Presidents - EVPs) employed by Telenor ASA.

Telenor Management Arena

This group includes senior management roles for a group unit or a larger functional area within such a unit. The positions are defined as Senior Vice Presidents (SVPs). These are roles that establish long term global strategies or management principles for Telenor Group within their functional area. Decisions are guided by Telenor's strategic direction and ambitions. The positions are part of Telenor Management Arena and they report to members of Group Executive Management.

Band A

This group includes management and expert roles for a group unit or a functional area within a group unit. The positions are defined as Vice Presidents (VPs).

The management roles can be described as senior management roles (TMA-1) with responsibilities for establishing and implementing plans to achieve the company's overall strategies and ambitions, as well as setting goals within their own functional areas. The expert roles are recognised as a position of senior expertise in one or more key functional areas where expertise is leveraged across Telenor's global organisation to achieve significant business impact.

Band B

This group includes management and expert roles responsible for a functional area or a sub-area within a function. The roles in this group are mainly defined as Director roles. The roles contribute on the strategic/tactical level by planning and implementation of strategic initiatives.

The management roles are defined as senior management responsible for deliverables and results for own units. The roles are responsible for resources, policies and guidelines, as well as processes within their area of responsibility.

The expert roles at this level are senior positions that require specialised depth and/or scope of expertise in their own field. The roles interpret complex internal or external business problems and recommend solutions/best practices based on basic understanding and market insight.

Band C

This group includes senior expert and specialist roles that have functional professional responsibility within areas of great impact. The roles require depth and/or breadth of competence within own area. The roles contribute on the tactical level with the planning and implementation of strategic initiatives and/or recommend solutions/best practices for complex internal or external business problems.

Band D

This group includes expert and specialist roles that have functional professional responsibility or partial responsibility. The roles require a high level of specialised knowledge and experience in their own field or broad competence in several related disciplines. The roles at this level are responsible for delivering and implementing action plans within their area of expertise.

Band E and F

This group includes specialists working at the operational level with the implementation of action plans, identification and solving problems and providing recommendations within their own field. The roles require a high level of knowledge and experience in their discipline.

1.2 Pay differentials, further explanation

Women's share of men's compensation is 90% in terms of average base salary and 87% in terms of average total compensation.

The main reason for the pay differentials at the company level is that men are overrepresented in the higher position categories (band A-D), while women are overrepresented in the lower position categories (band E-F). The positions that are eligible for additional compensation elements such as bonus and car allowance, are to a greater extent held by men. Some of the drivers for this are restructuring and repatriations as described in more detail in sections 5 and 6 below.

When controlling for other variables such as unit affiliation, department, and position level, the differences decrease significantly to about 4% on basic salary and approximately 4.5% on total compensation. In addition, we apply individual pay setting practices, mainly outside compensation systems, that determine the specific salary levels. Therefore, justified reasons for pay differences apply, such as performance, required competitive pay levels upon recruitment, etc.

The base pay differences within each of the levels can mainly be explained by higher average age and higher average tenure for men compared to women in the higher levels of the organisation, where men are overrepresented. For several years, Telenor ASA has focused on increasing the proportion of women in the traditionally more male dominated areas, and younger female talent has joined the company but at a naturally lower compensation level based on shorter professional experience. For the lower levels of the organisation, the situation is the opposite, and both the average age and average tenure are higher for women than for men at these levels.

When looking at total compensation this is reinforced further. Men with longer tenure in the more senior position categories are to a larger degree eligible for additional compensation elements such as bonus and car allowance than women in the same position groups. The cause of this is that the company has been through several restructuring processes in recent years, resulting in a reduction in position level for some employees, the majority of whom have been men. In such processes, base salary and additional compensation elements, such as bonus and car allowance, may have been retained partially or fully as an exception and as such do not correspond with new job level.

At any point in time, the company has a sizeable number of employees on international assignment to the other Telenor business units. The assignees are mainly placed into senior management roles in Telenor's companies in the Nordics and Asia, and base salary and additional compensation elements are issued in accordance with the scope of the role. Upon repatriation to Telenor ASA, the compensation level is to some extent retained upon return to the previous position or transfer to another position at a lower level.

It is mainly within bands A, B and E/F that compensation differences are observed. The factors that affect the pay differentials between women and men at the company level also affect the individual position categories.

Pension

Telenor ASA offers a defined contribution plan with company contributions for pensionable earnings up to 12G (G is the national insurance basis amount) with individual investment selections. Telenor also has a closed defined benefit plan limited to pensionable earnings of 12G, the plan was closed for new entrants in 2006. All new hires since 2006 are enrolled in the defined contribution plan.

1.3 Temporary employment, parental leave, actual and involuntary part time

The gender distribution has been mapped in terms of temporary employment, parental leave, actual part-time and involuntary part-time work. This is described in more detail in the following sections.

Total gender balance in the company number of employees		Temporary employees % of all employees		Parental leave average number of weeks taken		Actual part time % of all employees		Involuntary part time % of all employees	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
143	207	1.1	0.6	21.2	13.8	0.0	0.3	0.0	0.0

Parental leaves

In 2021, 24 employees took statutory parental leaves (ref. Working Environment Act section 12-5). Men accounted for 21% of the parental leaves in 2021 and took an average of 13.8 weeks. Women accounted for 79% and took an average of 21.2 weeks in 2021. This may represent only part of the full leave period, as the average is calculated based on the number of weeks of parental leave taken within the calendar year of 2021.

As the regulation provides flexibility and choice regarding the division of the parental leave period between the parents, Telenor ASA is focused on ensuring that men have equal opportunity, and also acceptance for taking parental leaves.

1.4 Sick leaves and recruitment

Sick leaves

The rate of sick leaves for Telenor ASA employees in 2021 was 1.7%, compared with 1.5% in 2020. For women, the rate of sick leaves equates to 2.6% which is an increase of 0.3 percentage points from 2020. For men, sick leaves were 1.2%, an increase of 0.2 percentage points from 2020. The rate of sick leaves is highest in the age groups 30-39 and above 60.

There is minimal recorded absence related to child or child carers illness. This is assumed to be related to the required home office during the Covid-19 pandemic and Telenor's Flexible Way of Work, which has allowed employees the ability to work, to some extent, despite illness of children or child carers.

Recruitment

In 2021, Telenor ASA recruited 23 new employees, of whom 14 (61%) women.

Involuntary part-time work

Telenor ASA has a very low rate of part-time positions. The survey conducted regarding involuntary part-time shows that there are no involuntary part-time employees in the company.

Part 2: How we work to ensure equality and non-discrimination in practice

1 Principles, procedures, and standards for equal opportunity and against discrimination

Telenor ASA is committed to Telenor Group's HR policies, where gender equality, anti-discrimination, diversity and inclusion are a vital part, including the Code of Conduct which states that:

"All employees deserve a workplace environment, independent of work location, that is free from harassment, intimidation, discrimination or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race, ethnicity, disability, national origin, religious or cultural beliefs or citizenship.

- *We view employee diversity as a competitive advantage, as it broadens our perspective and allows us to better understand our customers' needs and wants.*
- *Telenor does its utmost to actively promote equality in all employment practices.*
- *We foster a working environment where people are treated honestly and professionally and are valued for their unique ideas and differences".*

All Telenor employees are required to conduct eLearning including dilemma training and sign-off on the Code of Conduct on an annual basis. This was also carried out in 2021. Violations of the Code of Conduct and other guidelines shall be reported to the immediate line manager or by using Telenor's integrity hotline. In the autumn of 2021, 88% of Telenor ASA employees said they feel they could report violations of the Code of Conduct if they were to observe any. 7% answered neutrally, while 5% answered they were not comfortable to report any observations.

Telenor ASA follows Telenor's Group Manual for Diversity and Inclusion, People Policy and Telenor's whistleblowing procedures, which include the Integrity Hotline where violations of Telenor's guidelines can be reported anonymously, if desired. Incidents reported to the Integrity Hotline are followed up by the company's compliance function with necessary investigations and corrective measures. This applies to all negative/reprehensible incidents, including anything concerning equality. In 2021, no issues concerning equality or discrimination were raised.

In 2021, Telenor developed guidelines for flexibility, providing employees the opportunity to more frequently choose their location of work. This supports work-life balance and also supports employees with certain disabilities to reduce the amount of physically exhausting travel. These guidelines have been developed and implemented through Telenor's Flexible Way of Work project in close collaboration with employees and Union representatives.

Telenor ASA is bound by collective bargaining, collective agreements, and local agreements between Telenor ASA and ELog IT, NITO, Tekna and Negotia. The collective agreements also include provisions for equality and diversity. Telenor ASA has an active collaboration with all four unions and follows up the obligations in the collective agreements in close cooperation with them, both in formal and informal meetings.

Telenor ASA follows Telenor's diversity and inclusion requirements and the principles that are applicable to all business units, including the following:

- Ensuring that recruitment, selection, and promotion processes focuses on diversity.
- Providing learning and development opportunities with the aim of raising awareness and offering practical guidance related to diversity and inclusion, so that all employees can actively help build a workplace that embraces diversity and inclusion.

- Supporting and promoting internal networks and employee groups that aim to lift various under-represented groups and create a sense of belonging.

2 This is how we work to identify risks of discrimination and barriers to equality

2.1 Overall structure for the equality agenda

Telenor ASA's management teams and the union representatives are focused on complying with our internal policy documents, including the equality policy. Equality issues are mainly considered as an integrated subject in various meeting arenas between management and elected representatives, who regularly meet with an open agenda, both formally and informally, at various levels of the company. In 2021, an important area of dialogue has been the discussions with the unions concerning the introduction of increased work location flexibility, among other reasons to ensure work-life balance. There have not been any meetings where equality has been the sole topic.

Telenor ASA's Board of Directors has a strong focus on, and great commitment to, equality and inclusion, and Telenor's diversity and inclusion agenda are discussed with the Board on a regular basis.

The Working Environment Committee (WEC) plays an important role in various topics related to health, safety and the environment. The WEC in Telenor ASA has met four times in 2021. Relevant topics that have been discussed in the WEC meetings in 2021 are:

- The COVID-19 pandemic and enabling good working conditions for employees in the workplace and in the home office
- Follow-up of employee surveys
- Sick leave rates
- Usage of occupational health services
- Flexible Way of Work

Telenor Group has a strategic goal of maintaining a rate of at least 40% women employed in the company in the period until 2023. At the senior management level, the goal is 35% women and 35% non-Nordic managers.

Diversity and inclusion are an integral part of the company's human resource strategy, and gender balance and equal pay are analysed and discussed annually in People Reviews as part of the follow-up of the HR strategy.

Telenor has its own learning platform, Telenor Academy, with a considerable amount of training material covering gender equality, diversity and inclusion for employees and managers.

2.2 We discovered the following risks of discrimination and barriers to equality

Our employee engagement survey, Our Voice, is an important mapping tool for uncovering discrimination risk and barriers to equality. The survey is conducted globally each autumn. In addition, several smaller pulse surveys are carried out during the year. In addition to the employee surveys, cooperation with the union representatives and WEC is very important to understand issues and challenges concerning the work environment, sick leave rates and any equality issues.

The latest employee survey was conducted in the autumn of 2021. Below are some examples showing how employees perceive the overall equality situation in the company:

- When employees are asked if they feel they can be themselves at work, 91% answer positively, 8% answer neutrally and 1% answer negatively.
- When employees are asked if they feel everyone has the same opportunities for development regardless of gender, nationality, age, physical ability, personal background, or any other cause of discrimination, 81% answer positively, 12% answer neutrally and 7% answer negatively.
- When asked whether there is necessary flexibility to secure work-life balance, 84% answer positively, 8% answer neutrally and 8% answer negatively.
- When asked whether employees feel they can express their opinions without fear of negative reactions, 81% answer positively, 13% answer neutrally and 6% answer negatively.

Although the vast majority of employees respond positively or neutrally to these questions it is important to identify the need for measures to make changes for those who answer negatively. Further discussions and mapping of causes, as well as the implementation of relevant measures based on the results, is handled locally in each department.

In addition, we highlight the following risk factors for the state of gender equality in Telenor ASA:

- There is a predominance of men in higher management and expert roles
- There is a predominance of women in the more operational and administrative positions
- There is a significant gender imbalance in the technology area
- There are too few women ready for promotion to higher management positions

- Although most differences in compensation between women and men are due to explainable causes and decrease when controlling for age, tenure, unit affiliation and position level, there is still a small proportion of the pay differentials where the cause cannot be explained in a similar way

2.3 Possible causes of risks and hazards

We have found the following possible causes of risks and hazards in the assessments:

- The compensation disparities between women and men at company level are largely due to the predominance of men in the higher position levels
- There is a low proportion of women in the technology area, where traditionally there are fewer women with the required education
- There is considerable competition in the market for qualified labour in several important areas of the company's business, particularly within technology and business security.

2.4 We have initiated/implemented the following measures in 2021

Telenor ASA follows a structured process for people managers to follow up their teams through the year, called People Dialogue. This includes an established processes for appraisals, defining goals, and setting development plans for employees individually. The immediate manager is responsible for following up their team members, and this shall take place in accordance with the personnel policy without any form of discrimination.

Gender

On 8 March 2021, the President and CEO signed the UN Women Empowerment Principles (WEP). WEP is a guide for companies on how to promote gender equality in the workplace, in the market and in society. By signing WEP, Telenor demonstrates its commitment to working for gender equality.

In 2021, the SHE index ranked Telenor's Norwegian companies in their top 3 companies with the best gender balance in the country. Telenor hosted the SHE Conference 2021 at Fornebu and the President and CEO was one of the speakers. Several representatives from the leadership team attended the conference. As part of SHE's 2021 leadership programme 'SHE Leads', the President and CEO has been a mentor to one of the participants in the one-year programme. The focus during the mentoring period is to develop each participant's capacity and ability to gain a position in top management.

Telenor ASA has a total share of 41% women. At the senior management level Telenor Management Arena (TMA), 46% are women, and of Telenor ASA's four members of Group Executive Management, three are women.

Ethnicity & Disabilities

At Telenor ASA, there is a high level of ethnic diversity with employees of many different nationalities. This enriches the culture and helps create greater understanding and interaction across Telenor Group's business units and in the markets in which we operate. We use English as the standard working language to prevent anyone from feeling left out due to language barriers.

The company actively uses mobility programmes that allow employees to work on assignments abroad for shorter or longer periods in the various business units. There is also a global internal labour market, where employees are given the opportunity to apply for positions across national borders.

Telenor ASA participates in the Open Mind programme, which was initiated and is operated by Telenor Norway. During 2021, the company employed five candidates from this programme. The programme began in 1996 to contribute to the inclusion of groups that have fallen outside the labour market, and it is carried out in cooperation with the Norwegian Labour and Welfare Administration (NAV). The programme has two target groups, persons with disabilities and persons with an immigrant background from countries outside the EU. The programme lasts for one year and includes internships in various parts of the company. This is an important contribution in the work to strengthen our culture of inclusion.

Religion/ beliefs

Amongst employees in Telenor ASA, we find a diverse representation of religions and beliefs, and it is important for us to facilitate celebration of religious holidays. In our canteens, we also emphasise offering a varied menu, adapted to employees with differing religious affiliations. Employees at the head office at Fornebu have access to a prayer room.

Sexual orientation, gender identity and gender expression

All employees in Telenor ASA should be able to work without experiencing discrimination based on sexual orientation, gender identity or gender expression. A separate internal network has been established for employees who define themselves as LGBT+ with relevant groups on the internal communications platform Workplace. Pride 2021 was celebrated with rainbow flags at our offices.

Further information on human resource areas:

Recruitment

Telenor ASA strives to be a diverse and inclusive workplace, and this is an important part of the HR strategy. In our recruitment processes, as far as possible the final rounds should have candidates of both genders. This is followed up by the recruitment team in collaboration with the recruiting manager. We also strive to ensure female leaders are present in interviews of female candidates. Our recruitment team is actively working to ensure that the company is visible in relevant arenas to attract younger, newly qualified talent to the company. When external recruitment partners are used, we ensure that they have the same focus on gender balance and diversity.

Vacancies in the company are always first advertised internally. We have a global internal labour market, that give employees the opportunity to apply for positions across the company and across national borders.

Telenor ASA has in recent years run several trainee programmes and in August 2021 we welcomed a new group of candidates. Of these, 50% were women. Over the course of one year, the candidates will have two work rotations and work a period abroad to gain an understanding of how Telenor operates in the various markets.

Compensation and working conditions

Telenor ASA has personnel policy guidelines and collective agreements that ensure equal treatment of employees, regardless of their background and statutory discriminatory grounds, for example in terms of compensation levels and salary reviews.

The company has conducted salary negotiations with all four unions and in this connection has also provided managers with guidance on how to distribute salary review budgets in an equitable way, including for employees on parental or sick leaves. In connection with the gender pay analysis for 2021, we have worked closely with Telenor ASA's research group, Telenor Research. They have provided assistance in the gender pay gap analysis conducted.

Telenor ASA covers the full base salary and does not limit payments to 6G in the event of illness and parental leaves. We also cover full pay for fathers for the two weeks' leave in connection with the birth of their child. With regards to parental leaves, it is assumed that providing full pay during the leave may encourage more men to take parental leaves.

All employees and managers in the company are offered training regarding diversity and inclusion on our e-learning platform. Telenor ASA offers regular health, safety, and environment (HSE) courses for managers and HSE managers in all companies.

Promotion

The leadership teams conduct annual People Forums, where career development for team members is one of the topics. There is a focus on increasing the proportion of women being promoted, through defining specific development plans which are regularly followed up by the leader and the employee through the People Dialogue.

In addition, the company emphasizes that everyone should have the same development opportunities regardless of gender, nationality, age, physical abilities, personal background or any other basis for discrimination. This is measured annually in Telenor's Employee Engagement Survey - Our Voice.

Opportunities for development

Employees have outlined their own development plans in consultation with their manager. All employees are offered 40 working hours during the calendar year for their own learning and development. This initiative is called the 40 Hour Challenge. Most employees report that they believe the development opportunities are the same for all employees, regardless of their background. Employees are also offered various management development courses and advancement programmes.

Work-life balance/ care responsibilities/ parental and birth/ adoption leave

In 2021, Telenor ASA implemented Telenor's model for increased flexibility related to location of work. Employees can to a large degree within a certain framework, choose where they want to carry out their work. This has been developed in close cooperation and discussion with the unions. We consider increased flexibility as beneficial, helping ease the combination of work and family life, care responsibilities, getting children to and from kindergarten, as well as the ability for employees with chronic illness or disabilities to work.

During the pandemic, Telenor ASA has also provided an extended quota for leave of absence with pay in the event of children's illness.

Facilitation

An interdisciplinary working group was established in 2021 for handling issues related to the pandemic. After discussions with the unions, we offered to facilitate workplaces at home with loans of equipment from Telenor, offered to purchase cardboard desks to use as an adjustable height desk, offered additional monitor, keyboard, mouse, headset, etc. Employees who have had serious health or welfare reasons necessitating continued work at the office during the pandemic have had this facilitated. The need for facilitation was discussed with the immediate manager, who assessed the necessary measures, if needed in consultation with HR and the occupational health service.

During the pandemic we have increased the number of mental health appointments and physical treatments covered by our health insurance.

Work against harassment, sexual harassment and gender-based violence

Telenor ASA has its own Compliance function and whistleblowing routines for reprehensible incidents, including for harassment in various forms. Incidents can be reported via the Integrity Hotline, available to all employees. In 2021, no such cases were reported to the Integrity Hotline.

In 2021, all employees received a nano-quiz concerning sexual harassment to raise awareness of the issue among managers and employees. It was a voluntary survey, and approximately 35% of Telenor ASA employees completed the survey.

2.5 Planned measures for the coming year

In 2022, we will discuss with the unions, safety delegates and WEC the establishment of a yearly planning wheel for equality work, where the basis will be the four-step model for active equality work in section 26 of the Equality and Anti-Discrimination Act. The employee representatives and WEC will be involved in this work and participate in discussions about which fora are most appropriate for upcoming discussions and further work.

Telenor's Learning & Development department has developed an e-learning programme, Diversity & Inclusion Foundation, which is available to all managers and employees on our e-learning platform. This programme includes modules such as Recognising Discrimination, Unconscious Bias, Micro-aggressions and Diversity and Inclusion in the Workplace. Telenor ASA will encourage employees to complete this e-learning programme in 2022 as part of the previously mentioned 40-Hour Challenge.

Telenor will also continue the Open Mind programme for the two previously described target groups in 2022, and Telenor ASA is positive to the potential hiring of candidates from Telenor Open Mind and other external/public work training programmes. Telenor ASA has a professional research department that, among other things, is researching new forms of work, equal pay, social inclusion and diversity, as well as the effects of working from home. The results of their research will be used as the basis for our further work on gender equality and inclusion in the company.

Our recruiters will work on a project related to increasing diversity in recruitment, with an emphasis on seeing opportunities and uncovering possible obstacles to diversity. In this context, we will also assess our job advertisements and their messaging regarding diversity, also based on other criteria than gender.

As part of a review and revision of Telenor's Mobility Policy, the Mobility network is also looking at how to better adapt the policy to make it easier for families with young children to travel abroad. Our goal with this is to reduce possible obstacles for women taking on international assignments.

We will continue our analyses of gender pay gaps, and where unexplained pay differentials between women and men are discovered, these will be addressed.

We will also review our policies and salary adjustment practices in the event of a decline in role levels due to restructuring, as well as for salary adjustments upon repatriation to previous or new positions after completion of international assignments. The objective will be to ensure that these rules do not contribute to further pay differentials between women and men in the company.

Other specific measures within diversity and inclusion in 2022 include facilitation of training for HR covering gender and sexuality diversity, run by the FRI association, and we will continue to cooperate with the other Telenor companies to mark Pride 2022.

3 Assessment of results and expectations concerning further work on the agenda

There is still more work to do when it comes to gender balance in the company. We currently have a total share of 41% women, but it is important to work to maintain this share and to improve the gender balance, both in total and in the various areas of the company. We will continue to work actively to recruit women in the future, especially in expert and leadership positions at higher levels and in areas that have traditionally been male dominated. This also applies to recruitment of men in lower position levels. Continued implementation of trainee programmes will be part of this, where candidate selection will have an emphasis on gender balance and diversity.

In recent years, we have been working to develop our process for People Dialogue, and these conversations are an important tool for the further development of the company. The focus will be on ensuring that all employees have an active development plan that is continuously maintained and updated to help ensure the company's current and future needs for competence in the workforce. We also consider this an important measure for the improvement of gender balance in the company, by planning adaptive measures to further prepare women for senior leadership and advanced roles of expertise in higher position levels.

Employee surveys show that the vast majority of employees believe that everyone in the company has equal opportunities, regardless of gender, nationality, age, physical health, personal background or other possible causes of discrimination. Similarly, the vast majority of employees feel they can be themselves at work. Telenor sees this as highly positive. However,

there is potential for further improvements and this work will be followed up in the various departments when working on employee survey measures.

The company and the union representatives are satisfied with the work done related to increase work location flexibility. This work will continue in 2022. At the same time, we will assess whether increased flexibility and the possibility of working from home can potentially have negative effects on gender equality. Some studies have indicated that high frequency in working from home reduces employee visibility, for example when being assessed for a promotion. Therefore, it is an important part of our leaders' training in the Flexible Way of Work that working from home should not affect individual development and career opportunities in the company. It is important that this measure, intended as a benefit for employees and seen as a competitive advantage, does not have unintended negative consequences on equality. We will therefore continue to assess the need for relevant measures.

Telenor ASA will continue to recruit candidates via the Open Mind programme, both people with disabilities and people with minority background. We consider the programme to be an important contribution toward equality, not only in the company, but also at the societal level.

Although we consider the state of equality in the company overall to be at a high level, with many positive activities and measures, we see that an even more systematic approach is needed for the work on the equality agenda. This particularly applies to mapping of risk factors and the implementation of targeted measures concerning all possible grounds of discrimination, and especially combinations of these grounds.

In 2022, the company will work even more systematically for equality. We will work actively with the unions and the WEC and safety delegates to make the necessary priorities and establish suitable meeting arenas. This has also been discussed with the unions, who will be actively included in further work.

Fornebu, March 21st 2022
Board of Directors, Telenor ASA